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Diesel S.p.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIESEL S.P.A.,

Plaintiff

v.

KRACEBAGS898, KUAILE2023, KUKUFASION,
KURTGEIGER, KUWANBAG, LACOSK,
LAKIBAG, LETSHAPPY, LHZGOODBOY,
LIBERTY_BAG, LIGHTLUXURYBAG99,
LILINGG18, LILYSHOES1, LITCHI_BAG,
LIVELY123, LOUISBAGS_18,
LOUISEVIUTIONBAG, LOUISVUITTONS_BAG,
LOYALBAG9, LUBAG, LUXURIOUS_BAG,
LUXURY_BAG_188, LUXURY_BAGSHOP888,
LUXURY_DESIGNER_BAG1,
LUXURY_LADY_BAG, LUXURY_LUXURIES,
LUXURYBAG1122, LUXURYBAG2023,
LUXURYBAG985, LUXURYBAGCO,
LUXURYBAGS1923,
LUXURYBRANDDESIGNER, LUXURYS_BAG88
LUXURYS_BAGSSALE, LUXURYSHAND_BAG,
LUXURYSHOULDERBAGS, MACROWOODS,
MAIMAIMAI888, MARC_JACOBES,

Civil Case No.: 24 Civ. 6169

~~PROPOSED~~

**1) TEMPORARY
RESTRAINING ORDER; 2)
ORDER RESTRAINING
MERCHANT STOREFRONTS
AND DEFENDANTS' ASSETS
WITH THE FINANCIAL
INSTITUTIONS; 3) ORDER
TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION
SHOULD NOT ISSUE; 4)
ORDER AUTHORIZING
BIFURCATED AND
ALTERNATIVE SERVICE;
AND 5) ORDER
AUTHORIZING EXPEDITED
DISCOVERY**






FILED UNDER SEAL

MARNI_BAG, MAX_SHOES_, MAYNOR88,
 MEDUSA_BAG, MEILV5656,
 MIRRORQUALITYBAG, MIUMIUHANDBAGS,
 MJTOTE_BAG, MM789, MMYSHOES,
 MOON_BAG, MORE_BAG33,
 MOTORCYCLE_BAG, MR_FASHION,
 MUMOSHOES002, MY2024888, MYDAYS08,
 NANIESTORE, NBFA2022, NEISHOES668,
 NEVERFULL_BAGS, NEWBAG077, NICEBAG1,
 OGBAGS, OHO02, OK2023, OKK_STORE,
 OKKY_SHOP, OOOOMYGOD,
 OOTD_HANDBAG, ORGANIZER_BAG,
 ORIG_EDITON, ORIGINALS_BAGS,
 PENGNABAG66688, PENPEN888,
 PERFECT_DH_STORE, PERFECTBAG5566,
 PINGBUQINGYUNBAG, PLAIN_BAGS,
 PPCBAG19, PRACEBAGS898, PRADAHANDBAG,
 PRADAHANDBAGS, PROMISE_BAGS, PTJF8,
 QJYBAGS, QRACEBAGS666, RACEBAGS777,
 REALMADRID966, RELIEVE_CLOTHING,
 ROMANTIC_BAGS666, RUEE, SADDLE_BAG8,
 SANJIANG_CARGO, SANJIANG_ITEMS,
 SANJIANG_PRODUCTS, SATISFIEDBAG, and
 SCHOOLBAGS,

Defendants

GLOSSARY

<u>Term</u>	<u>Definition</u>
Plaintiff or Diesel	Diesel S.p.A.
Defendants	kracebags898, kuaile2023, kukufasion, kurtgeiger, kuwanbag, lacosk, lakibag, letshappy, lhzgoodboy, liberty_bag, lightluxurybag99, lilingg18, lilyshoes1, litchi_bag, lively123, louisbags_18, louiseviutionbag, louisvuittons_bag, loyalbag9, lubag, luxurious_bag, luxury_bag_188, luxury_bagshop888, luxury_designer_bag1, luxury_lady_bag, luxury_luxuries, luxurybag1122, luxurybag2023, luxurybag985, luxurybagco, luxurybags1923, luxurybranddesigner, luxurys_bag88 luxurys_bagssale, luxuryshand_bag, luxuryshoulderbags, macrowoods, maimaimai888, marc_jacobes, marni_bag, max_shoes_, maynor88, medusa_bag, meilv5656, mirrorqualitybag, miumiuhandbags, mjtotebag, mm789, mmyshoes, moon_bag, more_bag33, motorcycle_bag, mr_fashion, mumoshoes002, my2024888, mydays08, naniestore, nbfa2022, neishoes668, neverfull_bags, newbag077, nicebag1, ogbags, oho02, ok2023, okk_store, okky_shop, ooomygod, ootd_handbag, organizer_bag, orig_editon, originals_bags, pengnabag66688, penpen888, perfect_dh_store, perfectbag5566, pingbuqingyunbag, plain_bags, ppcbag19, pracebags898, pradahandbag, pradahandbags, promise_bags, ptjf8, qjybags, qracebags666, racebags777, realmadrid966, relieve_clothing, romantic_bags666, ruee, saddle_bag8, sanjiang_cargo, sanjiang_items, sanjiang_products, satisfiedbag, and schoolbags
DHgate	Dunhuang Group d/b/a DHgate.com, an online marketplace and e-commerce platform which allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale, sell and ship their wholesale and retail products originating from China directly to consumers worldwide and specifically to consumers residing in the U.S., including New York
Epstein Drangel	Epstein Drangel LLP, counsel for Plaintiff
New York Address	244 Madison Ave, Suite 411, New York, New York 10016
Complaint	Plaintiff's Complaint
Application	Plaintiff's <i>ex parte</i> Application for: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts (as defined <i>infra</i>) and Defendants' Assets (as defined <i>infra</i>) with the Financial Institutions (as defined <i>infra</i>); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery
Iesurum Dec.	Declaration of Stefano Iesurum in Support of Plaintiff's

	 5,653,098 for  for a variety of goods in Class 25; 5,701,776 for  for a variety of goods in Class 3; 6,733,921 for  for a variety of goods in Class 25; and 6,891,565 for  for a variety of goods in Class 3
Counterfeit Products	Products bearing or used in connection with the Diesel Marks, and/or products in packaging and/or containing labels bearing the Diesel Marks, and/or bearing or used in connection with marks that are confusingly similar to the Diesel Marks and/or products that are identical or confusingly similar to the Diesel Products
Infringing Listings	Defendants' listings for Counterfeit Products
User Accounts	Any and all websites and any and all accounts with online marketplace platforms such as DHgate, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them
Merchant Storefronts	Any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them
Defendants' Assets	Any and all money, securities or other property or assets of Defendants (whether said assets are located in the U.S. or abroad)
Defendants' Financial Accounts	Any and all financial accounts associated with or utilized by any Defendants or any Defendants' User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad)
Financial Institutions	PayPal Inc. ("PayPal"), Payoneer Inc. ("Payoneer"), DHgate (e.g., DHpay.com), PingPong Global Solutions, Inc. ("PingPong") and Airwallex (Hong Kong) Limited ("Airwallex")

Third Party Service Providers	Online marketplace platforms, including, without limitation, those owned and operated, directly or indirectly, by DHgate, as well as any and all as yet undiscovered online marketplace platforms and/or entities through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in Counterfeit Products which are hereinafter identified as a result of any order entered in this action, or otherwise
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On this day, the Court considered Plaintiff's *ex parte* application for the following: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts and Defendants' Assets with the Financial Institutions; 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing **in part** bifurcated and alternative service and 5) an order authorizing expedited discovery against Defendants, Third Party Service Providers and Financial Institutions in light of Defendants' intentional and willful offerings for sale and/or sales of Counterfeit Products.¹ A complete list of Defendants is attached hereto as **Schedule A**, which also includes links to Defendants' Merchant Storefronts and Infringing Listings. Having reviewed the Application, Declarations of Stefano Iesurum and Gabriela N. Nastasi, along with exhibits attached thereto and other evidence submitted in support thereof, the Court makes the following findings of fact and conclusions of law:

PRELIMINARY FACTUAL FINDINGS & CONCLUSIONS OF LAW

1. Diesel, launched in 1978 by Renzo Rosso, is an Italian fashion company specializing in high-quality jeans, apparel and accessories for women, men and children ("Diesel Brand").
2. The Diesel Products are marketed under the Diesel Marks. The Diesel Brand is recognized for its premium fashion designs and its playful advertising campaigns.
3. The Diesel Products are sold direct to consumers via Diesel's official website, <https://shop.diesel.com/en/>, and distributed through various channels of trade in the United States and abroad and via multi-brand retailers including, but not limited to, Nordstrom, Bloomingdales and Farfetch.
4. Recently, Diesel has undergone a rapid revitalization since Belgian designer Glenn Martens joined the Diesel as Creative Director in 2020. The Diesel Brand has since enjoyed

¹ Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Glossary.





Plaintiff's
allegations
are assumed
to be true
solely for the
purpose of
adjudicating
its request
for this
Order.

heightened attention across various media outlets including, The Business of Fashion, Harper's Bazaar, Fashion United and The New York Times, among others.

5. The Diesel Products typically retail for between \$45.00 - \$2,700.00.

6. While Diesel has gained significant common law trademark and other rights in its Diesel Marks and Diesel Products through use, advertising and promotion, Diesel also protected its valuable rights by filing for and obtaining federal trademark registrations.

8. For example, Diesel owns the following U.S. Trademark Registration Nos.: 1,498,698 for "DIESEL" for a variety of goods in Class 25; 1,564,710 for "DIESEL" for a variety of goods in Class 25; 1,989,390 for a variety of goods in Classes 3, 9, 14, 18, 24 and 25; 3,063,829 for "DIESEL FARM" for a variety of goods in Classes 29 and 33; 3,524,221 for "DIESEL" for a variety of goods in Classes 11, 20 and 21; 3,956,724 for "DIESEL BLACK GOLD" for a variety of goods in Classes 18 and 25; 4,268,431 for "DIESEL" for a variety of goods in Class 35; 4,835,318 for "DIESEL BAD" for a variety of goods in Class 3; 5,812,708 for "DIESEL SPIRIT OF THE BRAVE" for a variety of goods in Class 3; 5,899,446 for "DIESEL" for a variety of goods in Class 9; 6,313,073 for "DIESEL SOUND OF THE BRAVE" for a variety of goods in Class 3; 6,891,537 for "DIESEL LIBRARY" for a variety of goods in Classes 18 and 25; 6,891,563 for "DIESEL" for a variety of goods in Class 10; 7,257,006 for "DIESEL" for a variety of goods in Class 32; 7,369,396 for "DIESEL" for a variety of goods in Classes 9, 35, 36, 41 and 42; 1,605,656

for  for a variety of goods in Class 25; 1,939,141 for  for a variety of goods in Classes 3, 9, 14, 18, 24 and 25; 2,376,399 for  for a variety of goods in Classes 14, 18 and 25; 3,225,322 for  for a variety of goods in Classes 3, 9, 14, 18



and 25; 5,363,096 for



for a variety of goods in Class 3; 5,653,098 for



for a variety of goods in Class 25; 5,701,776 for

6,733,921 for **DIESEL** for a variety of goods in Class 25; and 6,891,565 for



for a variety of goods in Class 3. The Diesel Marks are currently in use in

commerce in connection with the Diesel Products. The Diesel Marks were first used in commerce on

or before the dates of first use as reflected in the respective registrations attached to the Complaint as

Exhibit C.

9. The success of the Diesel Products is due in part to Diesel's marketing and promotional efforts. These efforts include advertising and promotion through social media, Diesel's website (available at <https://shop.diesel.com/en/>) and print and internet-based advertising.

10. Diesel's success is also due to its use of the highest quality materials and processes in making the Diesel Products.

11. Additionally, Diesel owes a substantial amount of the success of the Diesel Products to its consumers and word-of-mouth buzz that its consumers have generated.

12. Diesel's efforts, the quality of Diesel's products and the word-of-mouth buzz generated by its consumers have made the Diesel Marks and Diesel Products prominently placed in the minds of the public. Members of the public and retailers have become familiar with the Diesel Marks and Diesel Products and have come to associate them exclusively with Diesel. Diesel has

acquired a valuable reputation and goodwill among the public as a result of such associations.

13. Diesel has gone to great lengths to protect its interests in the Diesel Products and the Diesel Marks. No one other than Diesel and its authorized licensees and distributors are authorized to manufacture, import, export, advertise, offer for sale or sell any goods utilizing the Diesel Marks, or use the Diesel Marks in connection with goods or services or otherwise, without the express permission of Diesel.

14. Defendants are manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying and/or offering for sale Counterfeit Products through Defendants' User Accounts and Merchant Storefronts with DHgate (see **Schedule A** for links to Defendants' Merchant Storefronts and Infringing Listings).

15. Defendants are not, nor have they ever been, authorized distributors or licensees of the Diesel Products. Neither Plaintiff, nor any of Plaintiff's authorized agents, have consented to Defendants' use of the Diesel Marks, nor has Plaintiff consented to Defendants' use of marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Diesel Marks.

16. Plaintiff is likely to prevail on its Lanham Act and related common law claims at trial.

17. As a result of Defendants' infringements, Plaintiff, as well as consumers, are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition, unless Plaintiff's Application for *ex parte* relief is granted:

- a. Defendants have offered for sale and sold ~~substandard~~ Counterfeit Products in the United States that infringe the Diesel Marks;

- b. ~~Plaintiff has well-founded fears that more~~ ^{More} Counterfeit Products ~~will~~ ^{may} appear in the marketplace; ~~that~~ consumers may be misled, confused and disappointed by the quality of these Counterfeit Products, resulting in injury to Plaintiff's reputation and goodwill; and ~~that~~ Plaintiff may suffer loss of sales for the Diesel Products; and
- c. ~~Plaintiff has well-founded fears that if they proceed~~ ^{If Plaintiff proceeds} on notice to Defendants on this Application, Defendants ~~will~~ ^{may}: (i) secret, conceal, destroy, alter, sell-off, transfer or otherwise dispose of or deal with Counterfeit Products or other goods that infringe the Diesel Marks, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (ii) inform their suppliers and others of Plaintiff's claims with the result being that those suppliers and others may also secret, conceal, sell-off or otherwise dispose of Counterfeit Products or other goods infringing the Diesel Marks, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (iii) secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from its sales of Counterfeit Products or other goods infringing the Diesel Marks and records relating thereto that are in their possession or under their control and/or (iv) open new User Accounts and Merchant Storefront under new or different names and continue to offer for sale and sell Counterfeit Products with little to no consequence.

18. The balance of potential harm to Defendants of being prevented from continuing to profit from their illegal and infringing activities if a temporary restraining order is issued is ~~far~~ outweighed by the potential harm to Plaintiff, its business, the goodwill and reputation built up in and associated with the Diesel Marks and to its reputations if a temporary restraining order is not

issued.

19. Public interest favors issuance of the temporary restraining order in order to protect Plaintiff's interests in and to its Diesel Marks, and to protect the public from being deceived and defrauded by Defendants' passing off of their substandard Counterfeit Products as Diesel Products.

20. Plaintiff has not publicized its request for a temporary restraining order in any way.

21. Service on Defendants via electronic means is reasonably calculated to result in proper notice to Defendants.

22. If Defendants are given notice of the Application, they are likely to secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from their sales of Counterfeit Products or other goods infringing the Diesel Marks. Therefore, good cause exists for granting Plaintiff's request for an asset restraining order. It typically takes the Financial Institutions a minimum of five (5) days after service of the Order to locate, attach and freeze Defendants' Assets and/or Defendants' Financial Accounts and it is anticipated that it will take the Third Party Service Providers a minimum of five (5) days to freeze Defendants' Merchant Storefronts. As such, the Court allows enough time for Plaintiff to serve the Financial Institutions and Third Party Service Providers with this Order, and for the Financial Institutions and Third Party Service Providers to comply with the Paragraphs I(B)(1) and I(C)(1) of this Order, respectively, before requiring service on Defendants.

23. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible to Plaintiff the records and documents relating to Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Counterfeit Products. Therefore, Plaintiff has good cause to be granted expedited discovery.

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiff's Application is hereby **GRANTED** as follows:

I. Temporary Restraining Order

A. IT IS HEREBY ORDERED, as sufficient cause has been shown, that Defendants are hereby restrained and enjoined from engaging in any of the following acts or omissions in the United States (with the exception of the acts and omissions described in paragraphs 6-8 below, which shall apply worldwide) for fourteen (14) days from the date of this order, and for such further period as may be provided by order of the Court:

- 1) manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in Counterfeit Products, or any other products bearing the Diesel Marks and/or marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Diesel Marks;
- 2) operation of Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts in violation of this Order;
- 3) directly or indirectly infringing in any manner Plaintiff's Diesel Marks;
- 4) using any reproduction, counterfeit, copy or colorable imitation of Plaintiff's Diesel Marks to identify any goods or service not authorized by Plaintiff;
- 5) using Plaintiff's Diesel Marks and/or any other marks that are confusingly similar to the Diesel Marks on or in connection with Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, offering for sale, selling and/or otherwise dealing in Counterfeit Products;

- 6) using any false designation of origin or false description, or engaging in any action which is likely to cause confusion, cause mistake and/or to deceive members of the trade and/or the public as to the affiliation, connection or association of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants with Plaintiff, and/or as to the origin, sponsorship or approval of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants and Defendants' commercial activities and Plaintiff;
- 7) secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with: (i) Counterfeit Products and/or (ii) any computer files, data, business records, documents or any other records or evidence relating to their User Accounts, Merchant Storefronts or Defendants' Assets and the manufacture, importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products;
- 8) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order; and
- 9) knowingly instructing any other person or business entity to engage in any of the activities referred to in subparagraphs I(A)(1) through I(A)(8) above and I(B)(1) and I(C)(1) below.

B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that Defendants and all persons in active concert and participation with them who receive actual notice of this Order, including the Third Party Service Providers and Financial Institutions who satisfy those requirements and are identified in this Order are hereby restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of this Court:

- 1) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to Defendants' Financial Accounts until further ordered by this Court.

C. IT IS HEREBY ORDERED, as sufficient cause has been shown, that immediately upon receipt of service of this Order, Defendants and all persons in active concert and participation with them who receive actual notice of this Order, including the Third Party Service Providers who satisfy those requirements, are restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of this Court:

- 1) operation of Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts in violation of this Order; and
- 2) instructing, aiding, or abetting Defendants and/or any other person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(1) through I(A)(8), I(B)(1) and I(C)(1) above, including, without limitation, by providing services necessary for Defendants to continue operating Defendants' User Accounts and Merchant Storefronts in violation of this Order.

**II. Order to Show Cause Why A Preliminary Injunction
Should Not Issue And Order Of Notice**

A. Defendants are hereby ORDERED to show cause before this Court in Courtroom XXXXX of

The parties shall
appear before the
Court through
Microsoft Teams
by dialing
646-453-4442,
entering the
meeting code
288196026, and
pressing pound
(#).

~~the United States District Court for the Southern District of New York at 500 Pearl~~

~~Street/40 Foley Square, New York, New York~~ on ~~August 22~~ September 3, 2024 at

2:30 p.m. or at such other time that this Court deems appropriate, why a
preliminary injunction, pursuant to Fed. R. Civ. P. 65(a), should not issue.

B. IT IS FURTHER ORDERED that opposing papers, if any, shall be filed electronically with
the Court and served on Plaintiff's counsel by delivering copies thereof to the office of
Epstein Drangel LLP at 60 East 42nd Street, Suite 1250, New York, NY 10165, Attn: Jason
M. Drangel on or before August 29, 2024. Plaintiff shall file any Reply
papers on or before August 30, 2024.

C. IT IS FURTHER ORDERED that Defendants are hereby given notice that failure to appear
at the show cause hearing scheduled in **Paragraph II(A)** above may result in the
imposition of a preliminary injunction against them pursuant to Fed. R. Civ. P. 65, which
may take effect immediately upon the expiration of this Order, and may extend throughout
the length of the litigation under the same terms and conditions set forth in this Order.

III. Asset Restraining Order

A. IT IS FURTHER ORDERED pursuant to Fed. R. Civ. P. 64 and 65 and N.Y. C.P.L.R.
6201 and this Court's inherent equitable power to issue provisional remedies ancillary to
its authority to provide final equitable relief, as sufficient cause has been shown, that within
five (5) days of receipt of service of this Order, the Financial Institutions shall locate and
attach Defendants' Financial Accounts and/or Defendants' Assets and shall provide written
confirmation of such attachment to Plaintiff's counsel.

IV. Order Authorizing Bifurcated and Alternative Service by Electronic Means

- A. IT IS FURTHER ORDERED pursuant to Fed. R. Civ. P. 4(f)(3), as sufficient cause has been shown, that service may be made on, and shall be deemed effective as to all Defendants if it is completed by the following means:
- 1) delivery of: (i) PDF copies of this Order together with the Summons and Complaint, and (ii) a link to a secure website (including NutStore, a large mail link created through Rmail.com and via website publication through a specific page dedicated to this Lawsuit accessible through ipcounselorslawsuit.com) where each Defendant will be able to download PDF copies of this Order together with the Summons and Complaint, and all papers filed in support of Plaintiff's Application seeking this Order to Defendants' e-mail addresses to be determined after having been identified by DHgate pursuant to **Paragraph V(C)**.
- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be deemed effective as to Defendants, Third Party Service Providers and Financial Institutions through the pendency of this action.
- C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be made within five (5) days of the Financial Institutions and Third Party Service Providers' compliance with **Paragraphs III(A) and V(C)** of this Order.
- D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that the Clerk of the Court shall issue a single original summons directed to all Defendants as listed in an attachment to the summons that will apply to all Defendants.

E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that service may be made and shall be deemed effective as to the following if it is completed by the below means:

- 1) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PayPal Inc. will be able to download a PDF copy of this Order via electronic mail to PayPal Legal Specialist at EEOMALegalSpecialist@paypal.com;
- 2) delivery of: (i) a PDF copy of this Order, or (iii) a link to a secure website where DHgate will be able to download a PDF copy of this Order via electronic mail to patrol@dhgate.com;
- 3) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Payoneer Inc. will be able to download a PDF copy of this Order via electronic mail to thirdpartyrequests@payoneer.com;
- 4) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PingPong Global Solutions Inc. will be able to download a PDF copy of this Order via electronic mail to legal-int@pingpongx.com; and
- 5) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Airwallex will be able to download a PDF copy of this Order via electronic mail to kking@maglaw.com.

V. Order Authorizing Expedited Discovery

A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days after receiving service of this Order, each Defendant shall serve upon Plaintiff's counsel a written report under oath providing:
 - a. their true name and physical address;

- b. the name and location and URL of any and all websites that Defendants own and/or operate and the name, location, account numbers and URL for any and all User Accounts and Merchant Storefronts on any Third Party Service Provider platform that Defendants own and/or operate;
 - c. the complete sales records for any and all sales of Counterfeit Products, including but not limited to number of units sold, the price per unit, total gross revenues received (in U.S. dollars) and the dates thereof;
 - d. the account details for any and all of Defendants' Financial Accounts, including, but not limited to, the account numbers and current account balances; and
 - e. the steps taken by each Defendant, or other person served to comply with **Section I**, above.
- 2) Plaintiff may serve interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure as well as Local Civil Rule 33.3 of the Local Rules for the Southern and Eastern Districts of New York and Defendants who are served with this Order shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiff's counsel.
- 3) Plaintiff may serve requests for the production of documents pursuant to Fed. R. Civ. P. 26 and 34, and Defendants who are served with this Order and the requests for the production of documents shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiff's counsel.
- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order the Financial Institutions served with this Order shall identify any and all of Defendants' Financial Accounts and/or Defendants' Assets, and

provide Plaintiff's counsel with a summary report containing account details for any and all such accounts, which shall include, at a minimum, identifying information for Defendants, including contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses), account numbers and account balances for any and all of Defendants' Financial Accounts and confirmation of said compliance with this Order.

C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Third Party Service Providers served with this Order shall identify any and all of Defendants' User Accounts and Merchant Storefronts, and provide Plaintiff's counsel with a summary report containing account details for any and all User Accounts and Merchant Storefronts, which shall include, at a minimum, identifying information for Defendants and Defendants' User Accounts and Defendants' Merchant Storefronts, contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses) and confirmation of said compliance with this Order.

D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days of receiving actual notice of this Order, all Financial Institutions who are served with this Order shall provide Plaintiff's counsel all documents and records in their possession, custody or control (whether located in the U.S. or abroad) relating to any and all of Defendants' Financial Accounts and/or Defendants' Assets, including, but not limited to, documents and records relating to:
 - a. account numbers;
 - b. current account balances;

- c. any and all identifying information for Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, names, addresses and contact information;
 - d. any and all account opening documents and records, including, but not limited to, account applications, signature cards, identification documents and if a business entity, any and all business documents provided for the opening of each and every of Defendants' Financial Accounts;
 - e. any and all deposits and withdrawals during the previous year from each and every one of Defendants' Financial Accounts and any and all supporting documentation, including, but not limited to, deposit slips, withdrawal slips, cancelled checks and account statements; and
 - f. any and all wire transfers into each and every one of Defendants' Financial Accounts during the previous year, including, but not limited to, documents sufficient to show the identity of the destination of the transferred funds, the identity of the beneficiary's bank and the beneficiary's account number.
- E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:
- 1) Within fourteen (14) days of receipt of service of this Order, the Third Party Service Providers served with this Order shall provide to Plaintiff's counsel all documents and records in its possession, custody or control (whether located in the U.S. or abroad) relating to Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, documents and records relating to:
 - a. any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers

for any and all User Accounts and Defendants' Merchant Storefronts that Defendants have ever had and/or currently maintain with the Third Party Service Providers that were not previously provided pursuant to Paragraph V(C);

- b. the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided pursuant to Paragraph V(C);
- c. the nature of Defendants' businesses and operations, methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts with any and all Financial Institutions associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- d. Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling of Counterfeit Products, or any other products bearing the Diesel Marks and/or marks that are confusingly similar to, identical to and constitute an infringement of the Diesel Marks.

VI. Security Bond

A. IT IS FURTHER ORDERED that Plaintiff shall place security in the amount of Five-thousand Dollars (\$5,000.00) with the Court which amount is determined adequate for the payment of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

VII. Sealing Order

A. IT IS FURTHER ORDERED that Plaintiff's Complaint and exhibits attached thereto, and Plaintiff's *ex parte* Application and the Declarations of Stefano Iesurum and Gabriela N. Nastasi in support thereof and exhibits attached thereto, and this Order shall remain sealed until the Financial Institutions and Third Party Service Providers comply with **Paragraphs I(B)-(C), III(A) and V(C)** of this Order.

SO ORDERED.

SIGNED this 19th day of August, 2024, at xxxxxxxxxxxxxxxxxx.



Dale E. Ho, UNITED STATES DISTRICT JUDGE
New York, New York

SCHEDULE A

No.	Defendant	Infringing Listing	Merchant Storefront
1	kracebags898	https://www.dhgate.com/product/designer-bag-purse-white-bag-nappa-luxury/969268962.html	https://www.dhgate.com/store/21958845#pd-sellerinfo-storename
2	kuaile2023	https://www.dhgate.com/product/white-nappa-woman-shoulder-designer-crossbody/974668194.html	https://www.dhgate.com/store/21911104#pd-sellerinfo-storename
3	kukufasion	https://www.dhgate.com/product/denim-womens-designer-diesl-bag-crossbody/942740802.html	https://www.dhgate.com/store/21815945#pd-sellerinfo-storename
4	kurtgeiger	https://www.dhgate.com/product/mirror-quality-luxury-designer-best-bag-womens/930915535.html	https://www.dhgate.com/store/21917945#pd-sellerinfo-storename
5	kuwanbag	https://www.dhgate.com/product/retro-bag-designe-famous-quality-pochette/957539703.html	https://www.dhgate.com/store/21930078#pd-sellerinfo-storename
6	lacosk	https://www.dhgate.com/product/y2k-shoulder-bag-for-man-womens-crossbody/963101650.html	https://www.dhgate.com/store/21154535#pd-sellerinfo-storename
7	lakibag	https://www.dhgate.com/product/handbag-designer-bag-luxury-handbags-shoulder/929220140.html	https://www.dhgate.com/store/21929190#pd-sellerinfo-storename
8	letshappy	https://www.dhgate.com/product/designer-shoulder-bag-woman-handbag-crossbody/949267166.html	https://www.dhgate.com/store/21958683#pd-sellerinfo-storename
9	lhsgoodboy	https://www.dhgate.com/product/fashion-woman-shoulder-bags-square-underarm/959428418.html	https://www.dhgate.com/store/21892811#pd-sellerinfo-storename
10	liberty_bag	https://www.dhgate.com/product/designer-bag-purse-white-bag-nappa-luxury/953081291.html	https://www.dhgate.com/store/21960687#pd-sellerinfo-storename
11	lightluxurybag99	https://www.dhgate.com/product/shoulder-bags-luxury-women-top-handle-handbags/958041939.html	https://www.dhgate.com/store/21960199#pd-sellerinfo-storename
12	lilingg18	https://www.dhgate.com/product/handle-designer-bag-womens-shoulder-bag-flap/924389487.html	https://www.dhgate.com/store/21679036#pd-sellerinfo-storename
13	lilyshoes1	https://www.dhgate.com/product/s-handbag-1dr-designer-bag-white-tote-purse/962199773.html	https://www.dhgate.com/store/21958299#pd-sellerinfo-storename
14	litchi_bag	https://www.dhgate.com/product/luxurys-leather-mens-designers-clutch-bag/940810967.html	https://www.dhgate.com/store/21917155#pd-sellerinfo-storename
15	lively123	https://www.dhgate.com/product/diese-shoulder-bags-women-top-handle-half/949956637.html	https://www.dhgate.com/store/21946722#pd-sellerinfo-storename
16	louisbags_18	https://www.dhgate.com/product/designer-bag-purse-white-bag-nappa-luxury/971799834.html	https://www.dhgate.com/store/21588602#pd-sellerinfo-storename
17	louiseviutionbag	https://www.dhgate.com/product/designer-bag-purse-white-bag-nappa-luxury/959781106.html	https://www.dhgate.com/store/21859713#pd-sellerinfo-storename

18	louisvuittons_bag	https://www.dhgate.com/product/mirror-quality-luxury-designer-best-bag-womens/939183733.html	https://www.dhgate.com/store/21910346#pd-sellerinfo-storename
19	loyalbag9	https://www.dhgate.com/product/fashion-flap-jingle-women-shoulder-bags-soft/913304526.html	https://www.dhgate.com/store/21923046#pd-sellerinfo-storename
20	lubag	https://www.dhgate.com/product/evening-bags-disel-jingle-bag-designer-luxury/941764754.html	https://www.dhgate.com/store/21816242#pd-sellerinfo-storename
21	luxurious_bag	https://www.dhgate.com/product/fashion-shoulder-messenger-bag-mens-wallet/949675976.html	https://www.dhgate.com/store/21851432?dsp=pcen.pd.soldby.store.dNgWbv9xULMIk760Q7k&resource_id=#pd-sellerinfo-storename
22	luxury_bag_188	https://www.dhgate.com/product/designer-bags-shoulder-bag-totes-real-leather/951412399.html	https://www.dhgate.com/store/21858738?dsp=pcen.pd.soldby.store.PcWtNaBT1WrB0wLpTGz1&resource_id=#pd-sellerinfo-storename
23	luxury_bagshop888	https://www.dhgate.com/product/2024-new-quality-designer-dis-mini-fashion/973681481.html	https://www.dhgate.com/store/21702699?dsp=pcen.pd.soldby.store.f5EGnMi3R5090X3afxmU&resource_id=#pd-sellerinfo-storename
24	luxury_designer_bag 1	https://www.dhgate.com/product/women-designer-m62650-key-pouch-pu-leather/928573103.html	https://www.dhgate.com/store/21908982?dsp=pcen.pd.soldby.store.ag20rwFzxMqcZWG62Ahl&resource_id=#pd-sellerinfo-storename
25	luxury_lady_bag	https://www.dhgate.com/product/designer-bag-crossbody-bag-fashionable-shoulder/953596302.html	https://www.dhgate.com/store/21925422?dsp=pcen.pd.soldby.store.XzvXd0FCVxUtkOBJ2e2s&resource_id=#pd-sellerinfo-storename
26	luxury_luxuries	https://www.dhgate.com/product/designer-crossbody-bag-fashion-shoulder-bag/922249039.html	https://www.dhgate.com/store/21925420?dsp=pcen.pd.soldby.store.nLHa4SoTvOTwipwUHP0d&resource_id=#pd-sellerinfo-storename
27	luxurybag1122	https://www.dhgate.com/product/shoulder-bags-tote-bag-high-quality-designer/901596527.html	https://www.dhgate.com/store/21913788?dsp=pcen.pd.soldby.store.B4O6r5vUhl5ekR3y3uGN&resource_id=#pd-sellerinfo-storename
28	luxurybag2023	https://www.dhgate.com/product/ggs-louiseity-bag-viutonity-lvs-evening-bags/818464378.html	https://www.dhgate.com/store/21845244?dsp=pcen.pd.soldby.store.L9tSCcTB402JoHuAF3fU&resource_id=#pd-sellerinfo-storename
29	luxurybag985	https://www.dhgate.com/product/handle-designer-bag-womens-shoulder-bag-flap/899905495.html	https://www.dhgate.com/store/21901453?dsp=pcen.pd.soldby.store.RyMF0DzzkBpPjzW2AVov&resource_id=#pd-sellerinfo-storename
30	luxurybagco	https://www.dhgate.com/product/designer-leather-shoulder-bag-luxury-classic/953478666.html	https://www.dhgate.com/store/21962030?dsp=pcen.pd.soldby.store.a4c9lGQMqUuVsb6d78ar&resource_id=#pd-sellerinfo-storename

31	luxurybags1923	https://www.dhgate.com/product/designer-diese-for-women-multi-color-mini/949447065.html	https://www.dhgate.com/store/21961899?dsp=pcen.pd.soldby.store.FSS5VE4ghP4T4kDyQlSa&resource_id=#pd-sellerinfo-storename
32	luxurybranddesigner	https://www.dhgate.com/product/handle-designer-bag-womens-shoulder-bag-flap/881783839.html	https://www.dhgate.com/store/21814296?dsp=pcen.pd.soldby.store.qVbcZxOfv78T6fXrWD3q&resource_id=#pd-sellerinfo-storename
33	luxurys_bag88	https://www.dhgate.com/product/mirror-quality-luxury-designer-best-silver/932923933.html	https://www.dhgate.com/store/21940456?dsp=pcen.pd.soldby.store.JLgcO8kgmyRbcmXE8sFp&resource_id=#pd-sellerinfo-storename
34	luxurys_bagssale	https://www.dhgate.com/product/crowdsourced-design-dingdang-2024-handheld/952521622.html	https://www.dhgate.com/store/21938664?dsp=pcen.pd.soldby.store.uNcq6MAIBZHgz8H1xauT&resource_id=#pd-sellerinfo-storename
35	luxuryshand_bag	https://www.dhgate.com/product/lk002-luxury-2023-new-advanced-texture-fashion/968901287.html	https://www.dhgate.com/store/21959734?dsp=pcen.pd.soldby.store.cVmTWZVKkbEon2U4tWBR&resource_id=#pd-sellerinfo-storename
36	luxuryshoulderbags	https://www.dhgate.com/product/hat-gift-designer-bag-handbags-shoulder-bags/928286126.html	https://www.dhgate.com/store/21915782?dsp=pcen.pd.soldby.store.mZNFTF59PzhG2Q4zGIE9&resource_id=#pd-sellerinfo-storename
37	macrowoods	https://www.dhgate.com/product/diesels-bag-1dr-luxury-women-shoulder-bag/874249543.html	https://www.dhgate.com/store/21832402?dsp=pcen.pd.soldby.store.ag0SqKOOfCLvx5KMeUoli&resource_id=#pd-sellerinfo-storename
38	maimaimai888	https://www.dhgate.com/product/designer-bags-shoulder-bag-dies-bag-double/921573426.html	https://www.dhgate.com/store/21933314?dsp=pcen.pd.soldby.store.NVnsSFy6eEGw6ZehrgWK&resource_id=#pd-sellerinfo-storename
39	marc_jacobes	https://www.dhgate.com/product/classic-flap-1dr-silver-leather-designer/969627255.html	https://www.dhgate.com/store/21940463?dsp=pcen.pd.soldby.store.sXAp8NFEB2aQoTWgp0V1&resource_id=#pd-sellerinfo-storename
40	marni_bag	https://www.dhgate.com/product/fashion-the-tote-best-silver-bag-luxury-lady/930283180.html	https://www.dhgate.com/store/products/21918778.html#st-navigation-products
41	max_shoes_	https://www.dhgate.com/product/designer-bag-purse-white-bag-nappa-luxury/951379537.html	https://www.dhgate.com/store/21966523?dsp=pcen.pd.soldby.store.zm5FzK6pUeG28TzWXtaT&resource_id=#pd-sellerinfo-storename
42	maynor88	https://www.dhgate.com/product/cool-1dr-silver-real-leather-designer-man/957937469.html	https://www.dhgate.com/wholesale/products/8aaac7268dc10160018dc178fa8308bc.html#pd-sellerinfo-storename

43	medusa_bag	https://www.dhgate.com/product/luxurys-leather-mens-designers-clutch-bag/937671770.html	https://www.dhgate.com/store/21910331?dsp=pcen.pd.soldby.store.zZHd43qKMwJVRPnn4K0M&resource_id=#pd-sellerinfo-storename
44	meilv5656	https://www.dhgate.com/product/classics-contrast-color-1dr-bag-woman-cross/849058111.html	https://www.dhgate.com/store/21679447?dsp=pcen.pd.soldby.store.Elgw9vXTDaClxcIOEMTH&resource_id=#pd-sellerinfo-storename
45	mirrorqualitybag	https://www.dhgate.com/product/designer-bag-tote-bag-shoulder-bag-dis-italy/956665375.html	https://www.dhgate.com/store/21947073?dsp=pcen.pd.soldby.store.qbftL8C4U0qUOvgI0EVg&resource_id=#pd-sellerinfo-storename
46	miumiuhandbags	https://www.dhgate.com/product/fashion-clutch-underarm-luxury-shoulder-bag/964546982.html	https://www.dhgate.com/store/21914254?dsp=pcen.pd.soldby.store.SL6DNBC3BbxLUNG9ZCMt&resource_id=#pd-sellerinfo-storename
47	mjtotebag	https://www.dhgate.com/product/women-designer-bag-shoulder-bag-flap-jingle/897136507.html	https://www.dhgate.com/store/21907301?dsp=pcen.pd.soldby.store.6FdHMBbD8OeB8O9Llga&resource_id=#pd-sellerinfo-storename
48	mm789	https://www.dhgate.com/product/handle-designer-womens-shoulder-bag-flap/974677021.html	https://www.dhgate.com/store/21909157?dsp=pcen.pd.soldby.store.17FmKmAk7p2ft8S94bA9&resource_id=#pd-sellerinfo-storename
49	mmshoes	https://www.dhgate.com/product/mirror-quality-1dr-designer-bags-womens-luxury/964618536.html	https://www.dhgate.com/store/21966527?dsp=pcen.pd.soldby.store.WPVrArEb3zDb0y5Lwcta&resource_id=#pd-sellerinfo-storename
50	moon_bag	https://www.dhgate.com/product/womens-top-handle-shoulder-mens-genuine-leather/928984301.html	https://www.dhgate.com/store/21918096?dsp=pcen.pd.soldby.store.a15Dpalg6Sz6KdvnGNHp&resource_id=#pd-sellerinfo-storename
51	more_bag33	https://www.dhgate.com/product/designer-handbag-deisel-bag-dingdang-womens/946865252.html	https://www.dhgate.com/store/21934837?dsp=pcen.pd.soldby.store.wqgp54AEHQT47AFviidJ&resource_id=#pd-sellerinfo-storename
52	motorcycle_bag	https://www.dhgate.com/product/designer-fashion-denim-underarm-bag-evening/862007088.html	https://www.dhgate.com/store/21859100?dsp=pcen.pd.soldby.store.CuM9A1DFQKyIAmCRp3AH&resource_id=#pd-sellerinfo-storename
53	mr_fashion	https://www.dhgate.com/product/letter-d-shoulder-bag-fashion-designer-genuine/966410274.html	https://www.dhgate.com/store/21815948?dsp=pcen.pd.soldby.store.Z1A6oSvz7lvqOGCgSpDE&resource_id=#pd-sellerinfo-storename
54	mumoshoes002	https://www.dhgate.com/product/mirror-quality-fashion-silver-bag-crossbody/923366355.html	https://www.dhgate.com/store/21904908?dsp=pcen.pd.soldby.store.J87gDD8U8vQnBkyXg2st&resource_id=#pd-sellerinfo-storename

55	my2024888	https://www.dhgate.com/product/designer-bag-luxury-handbags-shoulder-bags/941697589.html	https://www.dhgate.com/store/21934225?dsp=pcen.pd.soldby.store.uk93nndThRkg7u2PLGX2&resource_id=#pd-sellerinfo-storename
56	mydays08	https://www.dhgate.com/product/designer-bag-handbags-shoulder-bags-women/966038745.html	https://www.dhgate.com/store/21959274?dsp=pcen.pd.soldby.store.puJT3LwUwwi1QFpkBTw4&resource_id=#pd-sellerinfo-storename
57	naniestore	https://www.dhgate.com/product/women-s-fashion-underarm-pouch-designer-bag/943850790.html	https://www.dhgate.com/store/21934831?dsp=pcen.pd.soldby.store.GT93HfUr8w7vKxD2xXO3&resource_id=#pd-sellerinfo-storename
58	nbfa2022	https://www.dhgate.com/product/cool-1dr-sier-real-leather-designer-bag-man/967567734.html	https://www.dhgate.com/store/21910907?dsp=pcen.pd.soldby.store.6QTa6L2ULhA6KbhJyRq9&resource_id=#pd-sellerinfo-storename
59	neishoes668	https://www.dhgate.com/product/designer-bag-luxurious-with-box-pouchette/949007749.html	https://www.dhgate.com/store/21931205?dsp=pcen.pd.soldby.store.GHZBUvtg8RgoogWtMRg7&resource_id=#pd-sellerinfo-storename
60	neverfull_bags	https://www.dhgate.com/product/womens-handle-bag-shoulder-genuine-leather/937892376.html	https://www.dhgate.com/store/21940460?dsp=pcen.pd.soldby.store.EE3g9rFbnlRC5G9yu8yL&resource_id=#pd-sellerinfo-storename
61	newbag077	https://www.dhgate.com/product/designer-bags-luxury-woman-shoulder-bags/950315195.html	https://www.dhgate.com/store/21911875?dsp=pcen.pd.soldby.store.zgHcs7VmeXNcMDGilzGm&resource_id=#pd-sellerinfo-storename
62	nicebag1	https://www.dhgate.com/product/quality-1dr-mirror-designer-bags-womens-small/959687072.html	https://www.dhgate.com/store/21958351?dsp=pcen.pd.soldby.store.G4Qvw9a21ACV4Bu6PIC7&resource_id=#pd-sellerinfo-storename
63	ogbags	https://www.dhgate.com/product/diel-jingle-designer-bag-handbags-shoulder/923315524.html	https://www.dhgate.com/store/21933667?dsp=pcen.pd.soldby.store.tgwOvwH9Tu9Tnr6osGsl&resource_id=#pd-sellerinfo-storename
64	oho02	https://www.dhgate.com/product/handbags-bag-diel-designer-jingle-shoulder/915162005.html	https://www.dhgate.com/store/20967394?dsp=pcen.pd.soldby.store.go0Zldnp4Gu63QzkgavX&resource_id=#pd-sellerinfo-storename
65	ok2023	https://www.dhgate.com/product/cool-1dr-sier-real-leather-designer-bag-man/974279756.html	https://www.dhgate.com/store/21910902?dsp=pcen.pd.soldby.store.iRZT8xT1u36B6nTWVH27&resource_id=#pd-sellerinfo-storename
66	okk_store	https://www.dhgate.com/product/designer-bag-purse-luxury-women-shoulder/950799695.html	https://www.dhgate.com/store/21803062?dsp=pcen.pd.soldby.store.AQemlxBT7WQoJntMTleo&resource_id=#pd-sellerinfo-storename

67	okky_shop	https://www.dhgate.com/product/dis-italy-designer-bag-shoulder-bag-tote/947944735.html	https://www.dhgate.com/store/21849164?dsp=pcen.pd.soldby.store.ycvLlQp88b2dZlTsGrt&resource_id=#pd-sellerinfo-storename
68	ooooomygod	https://www.dhgate.com/product/luxury-leather-1dr-shoulder-bag-designer/970238132.html	https://www.dhgate.com/store/21948898?dsp=pcen.pd.soldby.store.VWOpz16U2F1PolKRwTGm&resource_id=#pd-sellerinfo-storename
69	ootd_handbag	https://www.dhgate.com/product/designer-bag-luxury-handbag-cross-body-flap/944152433.html	https://www.dhgate.com/store/21925416?dsp=pcen.pd.soldby.store.B5WeTKgQ9cC1A3mtitqg&resource_id=#pd-sellerinfo-storename
70	organizer_bag	https://www.dhgate.com/product/mirror-quality-luxury-designer-best-bag-cross/936961626.html	https://www.dhgate.com/store/21918069?dsp=pcen.pd.soldby.store.vcK1RNdpuTGer09er3ms&resource_id=#pd-sellerinfo-storename
71	orig_editon	https://www.dhgate.com/product/designer-bag-purse-white-bag-nappa-luxury/951839107.html	https://www.dhgate.com/store/21824978?dsp=pcen.pd.soldby.store.5lctp7B7EvEGkhWcNkDa&resource_id=#pd-sellerinfo-storename
72	originals_bags	https://www.dhgate.com/product/designer-bag-d-jingle-bag-luxury-handbag/925037946.html	https://www.dhgate.com/store/21858720?dsp=pcen.pd.soldby.store.GWzRW2M1lKS7gowfzczh&resource_id=#pd-sellerinfo-storename
73	pengnabag66688	https://www.dhgate.com/product/famous-brand-bags-women-s-handbags-luxury/941528815.html	https://www.dhgate.com/store/21953919?dsp=pcen.pd.soldby.store.NyMXtB3chT8hWhoMLpWG&resource_id=#pd-sellerinfo-storename
74	penpen888	https://www.dhgate.com/product/dies-el-cross-body-bags-shoulder-bag-genuine/926377092.html	https://www.dhgate.com/store/21842605?dsp=pcen.pd.soldby.store.ub1rsExUoM0SSdhVZg8J&resource_id=#pd-sellerinfo-storename
75	perfect_dh_store	https://www.dhgate.com/product/designer-bag-die-sel-for-women-multi-color/957711337.html	https://www.dhgate.com/store/21962244?dsp=pcen.pd.soldby.store.No8QWGcrCMX74MCQxzq1&resource_id=#pd-sellerinfo-storename
76	perfectbag5566	https://www.dhgate.com/product/designer-bag-purse-white-nappa-luxury-woman/955800795.html	https://www.dhgate.com/wholesale/products/8aaaa1f18dc5c2f8018dca0a61864d7f.html#pd-sellerinfo-storename
77	pingbuqingyunbag	https://www.dhgate.com/product/omens-shoulder-bag-disel-cross-body-designer/949547030.html	https://www.dhgate.com/store/21962659?dsp=pcen.pd.soldby.store.TKhZKe17FkfcM8Ox1Tuz&resource_id=#pd-sellerinfo-storename
78	plain_bags	https://www.dhgate.com/product/handle-designer-bag-womens-shoulder-bag-flap/921558184.html	https://www.dhgate.com/store/21860834?dsp=pcen.pd.soldby.store.Czg88zAyW8U4zZS2bl0h&resource_id=#pd-sellerinfo-storename

79	ppcbag19	https://www.dhgate.com/product/2024-fashion-flap-jingle-women-shoulder-bags/951102836.html	https://www.dhgate.com/store/21960388?dsp=pcen.pd.soldby.store.uplGq7QcD7tnwSkglJ36&resource_id=#pd-sellerinfo-storename
80	pracebags898	https://www.dhgate.com/product/designer-bag-luxury-handbags-shoulder-bags/973738957.html	https://www.dhgate.com/wholesale/products/8aaacee98dc5c2e3018dc99e28d243c1.html#pd-sellerinfo-storename
81	pradahandbag	https://www.dhgate.com/product/mirror-quality-luxury-designer-best-silver/932513686.html	https://www.dhgate.com/store/21917958?dsp=pcen.pd.soldby.store.gSTfF8Kfas6oWLiVa4T&resource_id=#pd-sellerinfo-storename
82	pradahandbags	https://www.dhgate.com/product/luxurys-leather-mens-designers-clutch-bag/932610820.html	https://www.dhgate.com/store/21940452?dsp=pcen.pd.soldby.store.f3m3WA9eTUTGpkVhtT4d&resource_id=#pd-sellerinfo-storename
83	promise_bags	https://www.dhgate.com/product/13-colors-womens-mens-handbag-brand-a-logo/877930543.html	https://www.dhgate.com/store/21859733?dsp=pcen.pd.soldby.store.ZW0o3Kb9xv4eJuAhBVI&resource_id=#pd-sellerinfo-storename
84	ptjf8	https://www.dhgate.com/product/white-nappa-woman-shoulder-designer-crossbody/970682626.html	https://www.dhgate.com/store/21918615?dsp=pcen.pd.soldby.store.l5VcwPFLqV5AaZ8tz2hy&resource_id=#pd-sellerinfo-storename
85	qjybags	https://www.dhgate.com/product/disel-jingle-designer-bag-luxury-handbags/953166855.html	https://www.dhgate.com/store/21959174?dsp=pcen.pd.soldby.store.zi1Mpz9TxN1UBByc71cT&resource_id=#pd-sellerinfo-storename
86	qracebags666	https://www.dhgate.com/product/for-women-designer-bag-purse-white-luxury/973780229.html	https://www.dhgate.com/store/21958834?dsp=pcen.pd.soldby.store.0eSK0BFfBgHwDPpHevT7&resource_id=#pd-sellerinfo-storename
87	racebags777	https://www.dhgate.com/product/designer-bag-luxury-handbags-shoulder-bags/971164219.html	https://www.dhgate.com/wholesale/products/8aaac2588dc5c2e5018dc99c925642a3.html#pd-sellerinfo-storename
88	realmadrid966	https://www.dhgate.com/product/top-quality-1dr-small-messenger-totes-crossbody/972140748.html	https://www.dhgate.com/wholesale/products/8aaaac0889bf9a780189cee865aa4505.html#pd-sellerinfo-storename
89	relieve_clothing	https://www.dhgate.com/product/cool-1dr-silver-gold-leather-designer-bag/971957489.html	https://www.dhgate.com/store/21951374?dsp=pcen.pd.soldby.store.wwTEteG3HQeHtOBt5CEQ&resource_id=#pd-sellerinfo-storename
90	romantic_bags666	https://www.dhgate.com/product/cool-1dr-silver-real-leather-designer-bag/949091624.html	https://www.dhgate.com/store/21859730?dsp=pcen.pd.soldby.store.FTamvKAww7m8qWs1rGTJ&resource_id=#pd-sellerinfo-storename
91	ruuee	https://www.dhgate.com/product/designer-purse-white-bag-nappa-luxury-woman/955606154.html	https://www.dhgate.com/store/21963491?dsp=pcen.pd.soldby.store.mGHnl4XH4Jpa0H5EEHfL&resource_id=#pd-sellerinfo-storename

92	saddle_bag8	https://www.dhgate.com/product/messenger-cool-crossbody-bags-womens-denim/857787974.html	https://www.dhgate.com/store/21859002?dspm=pcen.pd.soldby.store.sXn1TvImgKvxhl6XzSEc&resource_id=#pd-sellerinfo-storename
93	sanjiang_cargo	https://www.dhgate.com/product/cool-1dr-silver-real-leather-bag-luxurys/950699530.html	https://www.dhgate.com/store/20780858?dspm=pcen.pd.soldby.store.A9fey3ac04FNzTuKOuzR&resource_id=#pd-sellerinfo-storename
94	sanjiang_items	https://www.dhgate.com/product/multicolors-1dr-mini-handbag-shoulder-bag/951102089.html	https://www.dhgate.com/store/20780830?dspm=pcen.pd.soldby.store.U9mKHHy9WXCuPHM9z6Ci&resource_id=#pd-sellerinfo-storename
95	sanjiang_products	https://www.dhgate.com/product/1dr-silver-real-leather-designer-bag-man/950954428.html	https://www.dhgate.com/store/20781118?dspm=pcen.pd.soldby.store.k7NQ5Gzpw7vQZZHNib0g&resource_id=#pd-sellerinfo-storename
96	satisfiedbag	https://www.dhgate.com/product/bag-omens-shoulder-disel-cross-body-designer/950074880.html	https://www.dhgate.com/store/21958355?dspm=pcen.pd.soldby.store.RinTvVzOWabVv5uzU0G8&resource_id=#pd-sellerinfo-storename
97	schoolbags	https://www.dhgate.com/product/leather-mini-shoulder-bags-womens-purse-designer/935049647.html	https://www.dhgate.com/store/21917952?dspm=pcen.pd.soldby.store.Twrs7tAQ5cr29Lub3oV5&resource_id=#pd-sellerinfo-storename